

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

*Pro se* Plaintiff,

*-against-*

THE TRUSTEES OF COLUMBIA  
UNIVERSITY IN THE CITY OF NEW  
YORK et al.

Defendant#1, 2

Case No.: 25-cv-1108-ER

**Re: Leave to Re-file Sealed  
Documents with Redactions**

Dear Judge Ramos,

Plaintiff Jane Doe seeks leave to re-file the following sealed documents with appropriate redactions:

Doc. 3, 13, 14, 20, 21, 25, 27, 29, 36, 41, 75, 76, and 81.

In February 2025, the Court ordered sealing of the original Complaint to protect the *individual defendant's privacy* and permitted filing of a redacted version of the Complaint. On August 18, 2025, the Court ordered the sealing of documents containing the individual defendant's initials. There are two defendants in this action: Columbia University and one of its former students. Sealing the Complaint without a redacted version in the public docket could effectively shield the university, a recipient of federal funds, from public scrutiny and prevent the public from monitoring federal courts.

Specifically, Doc. 20 is the Complaint, and Doc. 81 is the Court's Opinion and Order on pseudonymization, both of which carry the strongest presumption of public access. *See Spin Master, Ltd. v. Aomore-US*, Slip Copy (2024),\*1: "a court determines the weight of the presumption that attaches to the document, looking to 'the role of the material at issue in the exercise of Article III judicial power and the resultant value of such information to those monitoring the federal courts. *Olson*, 29 F.4th at 87-88. The presumption of public access exists along a continuum. The strongest presumption attaches where the documents determine litigants' substantive rights. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 123 (2d Cir. 2006)" (internal quotation marks omitted).

Dated: August 20, 2025  
New York, New York

Respectfully submitted,

/s/ Jane Doe

Jane Doe, *Pro se*  
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